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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUL 29 2010
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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

FILED

AUGUST 31, 2010
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Ghaleb Azroui

Plaintiff(s),

vs.

board of trustees of Northeastern IL. University
Sharon Hahs, Jeffrey brown, Chong tong Chen,
Christine Douglas, Michael Kelly, Lawrence
Frank, Natzer Balsara, Alan Shub, James Lyons

Defendant(s).

10cv 4772

Judge John W. Darrah

Magistrate Young B. Kim

COMPLAINT FOR DEPRIVATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help the pro se plaintiff state allegations in as clear a manner as possible to assist the court and the defendant in understanding the claims. Please read the directions and the numbered paragraphs carefully. Some paragraphs or sub-paragraphs may not apply to your claim or claims. You may cross out paragraphs that do not apply to your claims. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Ghaleb Azroui.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, _____, is
(name, star number if known)
- ☐ an officer or official employed by _____;
(department or agency of government)
- _____ or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about _____, at approximately _____ ☐ a.m. ☐ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of _____
_____, in the County of _____,
State of Illinois, at _____,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
 - ☒ searched plaintiff or his property without a warrant and without reasonable cause;
 - ☒ used excessive force upon plaintiff;
 - ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
 - ☒ failed to provide plaintiff with needed medical care;
 - ☒ conspired together to violate one or more of plaintiff's civil rights;
 - ☒ Other:
1. Board of trustees at northeastern violated the law by preventing me to continue my education as a citizen, and graduated college.
 2. they violated law by recording my calls without my knowledge.
 3. they violated law by 2 Keeping my record with them after I made expungement.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** _____

8. Plaintiff was charged with one or more crimes, specifically:

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending

☒ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a

fair trial as follows

No evidence found, judge terminated the case because Northwestern sued me based on racism

☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal by the prosecutor or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions at the time and the acts or omissions of each defendant.)

I have evidences to proof that defendants violated the Law, and they racist all possible way against me. That will be presented to the court, for their racism and discrimination ~~Chong Tang Chen~~ to me and others. Alan Shub and Nauzer Balsara, and Chong Tang Chen discriminated me by banning me from school for nothing and they used Dean Kelly to practice their racism and discrimination to be arrested for trespassing. So, Lawrence Frank, Sharon Hubs, Jeffrey Brown, supported their discrimination, to be banned and arrested for no conviction. James Lyons violated the Law by arresting me without charging, and ignore my complains against those at school who discriminated me. Christine Douglas discriminated me without any reason.

11. Defendant acted knowingly, intentionally, willfully and maliciously.
12. Plaintiff suffered the following injury at as a result of defendant's conduct:

psychological injury, emotional harm, and mental anguish.

14. Plaintiff demands that the case be tried by a jury. ☐ Yes ☐ No

15. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff demands the following relief:

- A. Compensatory damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- ☒ B. *(Place X in box if you are seeking punitive damages.)* Punitive damages against the individual defendant; and

C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Charles Azroui

Plaintiff's name *(print clearly or type)*: Ghaleb Azroui

Plaintiff's mailing address: 8450 W. Castle Island Ave.

City Chicago State IL ZIP 60656

Plaintiff's telephone number: (773) 6714-0798

Plaintiff's email address *(if you prefer to be contacted by email)*: _____

crt1167@yahoo.com

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

I am Ghaleb Azroui residing at 8450 W. Castle Island Ave. , Chicago, IL. 60656. I am suing the following people: Sharon Hahs, Jeffrey Brown, Chong Tong Chen, Christine Douglas, Michael Kelly, Lawrence Frank, Nauzer Balsara, Alan Shub James Lyons and Northeastern IL. University. For causing me mental anguish, and nervousness by banning me from the campus of the University without my knowledge why I banned and what reason or accusation. They violated the rights of public school students to protection under the equal protection clause of the Fourteenth Amendment can be found in Chapter 11 of Volume I of IICLE's School Law Series dealing with civil rights litigation, with emphasis in 11.64 – 11.71 on litigation relating to discrimination on the basis of race.

They do not want me to be in college to finish my master degree after I obtained my bachelor degree, specially a teacher his name Nauzer Balsara who did every possible way to ban me from University and ruin my future and all names listed above supported him to ban me and caused me problems . The result of their racism and hate caused me to be arrested twice by police for trespassing when I was going to register for my graduate courses. First time on 09/25/2007 and second time on 02/24/2009. Even though I am an Alumni of that University which entitled me rights to use the Library and visiting the campus to participate some activities and events. He has been ruining my life with his action and left me living badly. He caused me a psychological injury. Richard N. Pearson, liability to Bystanders for Negligently inflicted Emotional Harm – A comment on the Nature of Arbitrary Rules, 34 U.Fla.L.Rev. 477,485 (1982). The judges dismissed the two cases because they could not proof any thing against me, and the judges found my case was wrong to be raised to the court because it based on racism and discrimination. No proof of any violation at school I had done.

Later on, on 04/17/2007 I found that teacher who called Nauzer Balsara has not been wanting me to be in the College, he caused me the ban after I complained him to the dean of student (Michael Kelly), the Provost (Lawrence Frank), the vice president of student affair (Terrel), the executive director (Santos Rivera) and the president of the University (Sharon Hahs). All of them threw my complains away and never investigated my complains. That proves strongly of their racism and hate, specially Sharon Hahs who sent the police to my home because I sent her an E.mail about racism and violations against me by her faculties. And Santos Rivera with Jeffrey Brown who insulted me by calling me bad word because I wanted to complain the racism and insulting against me by those faculties. Jeffrey Brown considered if I want to continue my current courses at school, he will take civil or criminal action against me. He considered continue my educations is CRIME.

Alan Shub who used his authority as supervisor and dean College of business to kick me out of college by letting teachers who taught me to flunk me in classes that I registered with them and distort my reputation by telling teachers in business department that I bad and dangerous. He encouraged racist teacher like Nauzer Balsara to cause me arresting and kicked me out of University as he has been kicking many students before me. He succeeded with what he planned for, after Alan Shub knew that Balsara is from Iran and racist, he will do his best to ruin my life.

Those people at the university intent to harm me and ruin my future education, they succeeded after they ruin my record not to work by arresting me. They practiced their hate and racism by preventing me to continue my education which is right I got it by State Law as a citizen to get education with state college. Therefore, they violated state law which allows me to continue my education, and misuse their authority which is given by state to help me processing my education not to send me to Jail. Therefore, I want to charge them according to the law about their violations specially against state law and racism against me.

I am suing those people mentioned above and Northeastern IL. Universit for \$30,000.00 dollar each one for causing me pain and psychological problems and make me losing a job I suppose to get it with USA Army in Iraq as an advisor and translator with a salary \$150,000.00 dollar, and to do my duty as a citizen. They ruin my record not to work any more.

In addition, I am suing Northeastern Chief Police James Lyons for violations against me by promoting some racists people there to keep banning me and if I call the University to sue me, they considered me a criminal and kept me away from school and threatening me many times by Lt. Cannonly to send me to jail. The officers arrested me brutally and insulted me as a criminal person, in spite of their knowledge that I am an educated person at University and not trouble maker. I missed some money from my wallet after they arrested me, I reported that to the chief Police but he ignored my complain too, and they violated clearly State Law to investigate of my complain. Also, chief Lyons never arrest any violators from the administration at school or faculties or sexual harassor of two girls at school who convicted by the court So, I want to charge all of them mentioned above for violation the law of Illinois and dismiss me from school, sending me to jail, and causing me physical and emotional distress. Thomas v. Fuerst, 345 Ill.App.3d 929, 803 N.E.2d 619,281 Ill.Dec. 215 (1st Dist. 2004).

Also, I want to revoke the ban that preventing me from going to my college to finish my master degree as other students. And serve our society as a citizen.